Exhibit 3

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

STATE OF NEW YORK, et al., Plaintiffs, v. DONALD TRUMP, in his official capacity as President of the United States, et al., Defendants.	Case. No. 25-cv-11221

DECLARATION OF ALISON BRIZIUS

I, Alison Brizius, declare of my personal knowledge as follows:

1. I am currently employed by the Massachusetts Executive Office of Energy and Environmental Affairs (EEA) as Assistant Secretary and Director of the Office of Coastal Zone Management (CZM). CZM is the lead policy, technical assistance, and planning agency on coastal and ocean issues in Massachusetts. I have held this position since May 6th, 2024. Prior to joining CZM, I held positions at the City of Boston and the University of Chicago. At the City of Boston, I served as the Director of Climate and Environmental Planning from August 2017 to July 2021 and as the Commissioner of the Environment Department from August 2021 to April 2024 where I was responsible for leading the Environment Department's work to address climate change impacts, climate resilience, greenhouse gas (GHG) mitigation and environmental protection initiatives. Prior to joining the City of Boston, from 2011 to 2017, I served as the Executive Director of the Center for Robust Decision-making on Climate and Energy Policy (RDCEP). I have extensive professional knowledge and experience regarding the impacts of climate change on coastal resources and communities in Massachusetts, as well as

Massachusetts' efforts to plan and prepare for such impacts. My job duties include providing oversight and administration for CZM and directing policy development, planning efforts, and technical approaches for CZM program areas. I supervise a team of 30 plus multidisciplinary professionals working in a range of program areas, including climate change adaptation and coastal resilience. Many of the staff I oversee have significant professional experience in coastal and environmental management, planning, science, policy, and other related fields. I routinely engage and partner with scientific and technical subject matter experts in federal agencies and academia. As part of my management responsibilities, I oversee CZM's work to provide information, strategies, tools, and financial resources to support communities and people working and living on the Massachusetts coast to address the challenges of erosion, flooding, storms, sea level rise, and other climate-change impacts. For instance, I oversee the development of sea level rise decision-support tools and services including inundation maps and guidance documents. I also direct CZM's work to provide policy and planning support and technical assistance to other state agencies, local communities, and private entities regarding adaptation and increasing resilience to current and future impacts of climate change on our coast. For example, I oversee CZM's coastal resilience program that offers competitive grants, hands-on technical and planning assistance, and decision-support tools to Massachusetts cities and towns and non-profit organizations for the purposes of planning for and adapting to sea level rise and other climate-change-related coastal hazards.

2. In my role with CZM, I chair and participate in various legislative and executive branch groups, including the Massachusetts Ocean Advisory Commission and Science Advisory Council and associated work groups and the Seaport Economic Council. I also represent the Commonwealth of Massachusetts (Commonwealth) on several multi-state organizations,

including the Coastal States Organization, Northeast Regional Ocean Council, the Gulf of Maine Council on the Marine Environment, and Bureau of Ocean Energy Management's Gulf of Maine Intergovernmental Renewable Energy Task Force.

3. I received a Ph.D. and a M.S. in Physics from the University of Chicago, and a B.S. in Physics from Stanford University. I am aware of and familiar with the science related to global and local climate change. My knowledge comes from my review of scientific peer-reviewed literature and consensus assessment reports, attendance at professional conferences and workshops, and professional exposure to other research and material. As a result of my professional experience and my knowledge of the peer-reviewed literature and reports, as well as my knowledge of the Massachusetts coastal resources and policies and planning related thereto, I can attest to the following.

4. The purposes of this declaration are to: (i) briefly describe the serious harms that climate change, caused in part by greenhouse gas pollutants from conventional energy sources including natural gas and fuel oils, is causing and will continue to cause to Massachusetts' coastal resources, infrastructure, and communities; and (ii) briefly summarize extensive state and local initiatives, programs, and plans to prepare for the impacts of climate change.

5. I am submitting this declaration in support of the States' motion for summary judgment. I am generally familiar with the Executive Memorandum entitled "Temporary Withdrawal of All Areas on the Outer Continental Shelf from Offshore Wind Leasing and Review of the Federal Government's Leasing and Permitting Practices for Wind Projects" (Memorandum) signed on signed on January 20, 2025, by President Trump, and particularly the sections relevant to Massachusetts's offshore wind industry. Section one of the Memorandum withdraws from disposition all areas within the Outer Continental Shelf (OCS) as defined in the

Outer Continental Shelf Lands Act, 43 U.S.C. §§ 1331 *et seq*., but does not alter the existing rights associated with existing leases. Section two of the Memorandum directs all relevant members of the executive branch not to issue or renew approvals, rights of way, permits, leases, or loans for onshore and offshore wind projects. During that pause, the Secretary of the Interior will lead an assessment of the environmental impacts of wind energy on wildlife, and of the economic implications of wind energy.

I. Climate Change Threatens Massachusetts' Coastal Resources and Communities

6. The accelerated rate of global sea level rise and the severity and timing of coastal impacts due to this rise in sea level are largely dependent on current and future global greenhouse gas emissions, including from conventional energy resources, and reduction measures. Climate scientists have high confidence that anthropogenic drivers have been the dominant cause of global mean sea level rise since 1970.[1] Continued emissions of greenhouse gases will result in increases in global temperature, yielding additional contributions to global sea level rise (*i.e.*, increased contributions from thermal expansion of warmer waters and melting of land-based ice sheets).[2]

7. According to the U.S. Global Change Research Program, human-caused climate change has led to a rise in average sea level along the continental U.S. coastline of about 11 inches, which is higher than the rise in global mean sea levels of 7 inches since 1900, and a rate

[1] Oppenheimer, M., B.C. Glavovic et al., *Chapter 4: Sea Level Rise and Implications for Low-Lying Islands, Coasts and Communities*, *in* IPCC SPECIAL REPORT ON THE OCEAN AND CRYOSPHERE IN A CHANGING CLIMATE (H.-O. Pörtner et al. eds., 2019).

[2] *See generally* U.S. GLOBAL CHANGE RESEARCH PROGRAM, FIFTH NATIONAL CLIMATE ASSESSMENT (Crimmins, A.R., C.W. Avery, D.R. Easterling, K.E. Kunkel, B.C. Steward, and T.K. Maycock, eds., 2023), https://doi.org/10.7930/NCA5.2023.

of rise (1.8 inches per decade) greater than global rates of rise (1.3 inches per decade) over the period of 1993-2020. Over this same time period, both the global and continental U.S. rates of sea level rise have accelerated.[3] Global average sea levels are projected to continue to rise by 1 to 6.5 feet by 2100 (compared to the baseline year 2000).[4] Due to the relationship of the East Coast to the Gulf Stream and melting Antarctic ice sheets, sea level rise will be higher than the global average on the East Coast of the United States.[5]

8. A March 2018 report entitled *Massachusetts Climate Change Projections* (2018 Projections Report), informed by a team of scientists from the U.S. Department of the Interior's Northeast Climate Adaptation Science Center at the University of Massachusetts Amherst, presents the best available, peer-reviewed science on climate change downscaled, or localized, for Massachusetts through the end of this century.[6] A key component of the 2018 Projections Report is sea level rise projections for the state's coastline. The analysis for Massachusetts consisted of a probabilistic assessment of future relative mean sea level rise at tide gauge stations with long-term records at Boston Harbor, MA, Nantucket, MA, Woods Hole, MA, and Newport, RI.[7] The sea level projections are based on a methodology that provides complete probability distributions for different greenhouse gas emissions scenarios.[8] Working with the principal investigators (Dr. Robert DeConto and Dr. Robert Kopp) and a team of external peer reviewers,

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[3] *Id.* at 10.

[4] *Id.*

[5] *Id.*

[6] MASSACHUSETTS CLIMATE CHANGE PROJECTIONS (2018), https://eea-nescaum-dataservices-assets-prd.s3.us-east-1.amazonaws.com/resources/production/MA%20Statewide%20and%20MajorBasins%20Climate%20Projections_Guidebook%20Supplement_March2018.pdf.

[7] *See id.* at 11 (citing Robert M. DeConto & Robert E. Kopp, *Massachusetts Sea Level Assessment and Projections*, Technical Memorandum (2017)).

[8] *See id.* (citing Robert E. Kopp et al., *Probabilistic 21st and 22nd century sea level projections at a global network of tide gauge sites*, 2 EARTH'S FUTURE 383–406 (2014)).

CZM reviewed and synthesized the downscaled projections, which are made available by the Commonwealth, to set forth a standard set of sea level rise projections to be used by municipalities, state government, industry, the private sector, and others to assess vulnerability and identify and prioritize actions to reduce risk. Given a high emissions pathway (Representative Concentration Pathway 8.5), compared to a baseline year of 2000, Massachusetts is projected to experience approximately 4.0 to 7.6 feet of sea level rise over the twenty-first century (extremely unlikely to be exceeded, 99.5% probability), with as much as 10.2 feet possible when accounting for higher ice sheet contributions (exceptionally unlikely to be exceeded, 99.9% probability).[9]

9. Massachusetts has approximately 1,500 miles of coastline[10] and a coastal zone (land areas from the shoreline to 100 feet inland of major roads or railways from New Hampshire to Rhode Island) that encompasses 886 square miles.[11] Approximately 5.2 million people or 73% of the Commonwealth's population reside in coastal counties.[12] According to the 2023 ResilientMass Plan (the state's hazard mitigation and climate adaptation plan), the total value of structures within the floodplain for the current 100-year return period coastal storm is about $55 billion, of which about $40 billion is residential, $12 billion is industrial, and $2.5 billion is

[9] MASSACHUSETTS CLIMATE CHANGE PROJECTIONS (2018), *supra* note 6.

[10] NOAA OFFICE FOR COASTAL MANAGEMENT - MASSACHUSETTS, https://coast.noaa.gov/states/massachusetts.html.

[11] MASSACHUSETTS OFFICE OF COASTAL ZONE MANAGEMENT, COASTAL ZONE MAP, https://www.mass.gov/doc/the-massachusetts-coastal-zone-map/download.

[12] NOAA OFFICE FOR COASTAL MANAGEMENT - MASSACHUSETTS, https://coast.noaa.gov/states/massachusetts.html.

commercial.[13] The number of vulnerable infrastructure assets and anticipated loss will grow over time as rising seas expand the coastal floodplain.

10. In addition, there is very high confidence that climate change and sea level rise will increase the frequency and extent of flooding associated with coastal storms, such as hurricanes and nor'easters.[14] In response to higher sea levels, coastal flooding will occur 5–10 times more often by 2050 than 2020 in most locations, with damaging flooding occurring as often as disruptive "high tide flooding" does now if action is not taken.[15] Moderate to major coastal storm events will cause inundation of larger areas, and will occur more frequently, damaging or destroying coastal engineering structures such as seawalls; critical infrastructure such as pump stations, wastewater treatment plants, and transportation systems; and businesses and private property. When coastal storms intensify more rapidly and decay more slowly, it leads to stronger storms that extend farther inland with heavier rainfall and high storm surges. By the 2070s, the total areas flooded during a 100-year coastal flood event in Massachusetts can rise by up to 1.75 times of that in the current baseline (1997-2017).[16] The threat of coastal hazards is also magnified by the increased frequency and magnitude of compound events, which are events due to the joint occurrence of heavy precipitation, higher river flows, elevated groundwater levels, soil saturation, and elevated ocean water levels.[17] More frequent severe storm surges will create

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[13] RESILIENTMASS PLAN: 2023 MASSACHUSETTS STATE HAZARD MITIGATION AND CLIMATE ADAPTATION PLAN (2023), https://www.mass.gov/doc/resilientmass-plan-2023/download.

[14] *See* U.S GLOBAL CHANGE RESEARCH PROGRAM, *supra* note 2, at 27.

[15] May, C.M., M.S. Osler et al., *Chapter 9: Coastal Effects*, *in* FIFTH NATIONAL CLIMATE ASSESSMENT (Crimmins, A.R., C.W. Avery, D.R. Easterling, K.E. Kunkel, B.C. Stewart, and T.K. Maycock, eds., 2023), https://nca2023.globalchange.gov/chapter/9/.

[16] 2022 MASSACHUSETTS CLIMATE CHANGE ASSESSMENT VOLUME II – STATEWIDE REPORT Fig. 13 (2022), https://www.mass.gov/doc/2022-massachusetts-climate-change-assessment-december-2022-volume-ii-statewide-report.

[17] May, C.M., M.S. Osler et al., *supra* note 15.

serious risks for public safety and health, especially where roads, sewer mains, and pump stations are impacted. Frequent tidal flooding from sea level rise may also lead to increases in respiratory diseases due to mold from dampness in homes.[18] Saltwater intrusion—or the increased penetration of salt water into sources of fresh water—from sea level rise will impact water resources (such as drinking water) by contaminating freshwater sources with salt water and also through the corrosion of water supply infrastructure.

11. The Massachusetts coast includes a diverse array of marine and estuarine ecosystems including, among others, sandy beaches, rocky shores, barrier beaches, islands, and salt marshes. These ecosystems offer immense commercial, recreational, cultural, and aesthetic values to the residents of and visitors to the Commonwealth, while also serving important ecological functions. For instance, natural coastal resources, especially beaches and salt marshes, provide valuable coastal resilience services to the Commonwealth by buffering inland coastal communities and the built environment from waves and storm surges. These coastal ecosystems are also a key driver of outdoor recreation and tourism, which is a significant contributor to the state's $8.3 billion marine economy.[19] Salt water will also impact natural coastal resources, as saltwater intrusion into salt marshes and freshwater wetlands will alter the composition of plant species and affect wildlife that depend on these ecosystems.

II. Massachusetts is Experiencing Economic Impacts from Climate Change and is Expending Significant Resources to Adapt and Prepare for Impacts of Climate Change on Our Coastal Areas

[18] *See generally* CENTERS FOR DISEASE CONTROL & PREVENTION, U.S. DEP'T OF HEALTH & HUMAN SERVS., COASTAL FLOODING, CLIMATE CHANGE, AND YOUR HEALTH: WHAT YOU CAN DO TO PREPARE (2017), www.cdc.gov/climateandhealth/pubs/CoastalFloodingClimateChangeandYourHealth-508.pdf.

[19] NOAA 2024 MARINE ECONOMY REPORT MASSACHUSETTS, https://coast.noaa.gov/data/digitalcoast/pdf/marine-economy-massachusetts.pdf.

12. The Commonwealth is already experiencing impacts of climate change. The relative sea level trend at the Boston tide station is (+) 2.97 millimeters per year based on monthly mean sea level data from 1921 to 2024, which is equivalent to a change of 0.97 feet over 100 years.[20]

13. These impacts are directly harming the welfare of Massachusetts residents and causing significant economic losses. Coastal storms currently result in flooding with extensive damages to public infrastructure (as well as to private homes and businesses), and a significant demand for emergency response and recovery services, including services funded and provided by the Commonwealth. For example, a nor'easter on March 2–3, 2018, which reached the third-highest water level recorded at the Boston Harbor tide gauge, resulted in major flooding, damages, and expenditures for response and recovery. On April 30, 2018, Massachusetts Governor Charles Baker requested a federal disaster declaration, which the Trump Administration approved on June 25, 2018. The disaster declaration authorized FEMA Public Assistance funding for eligible applicants (FEMA DR-4372-MA), and as of March 2023, FEMA has disbursed $15.6 million to coastal communities for public storm-related costs related to the event.[21]

14. Sea level rise and other impacts of a changing climate pose major risks to communities in Massachusetts' coastal zone. Estimates of coastal property damage in the state are expected to reach over $1 billion a year, on average, by the 2070s with over 70% of damages in the Boston Harbor region, where a large portion of the Commonwealth's commercial

[20] *See* NOAA, *Relative Sea Level Trend 8443970 Boston, Massachusetts*, TIDES & CURRENTS, https://tidesandcurrents.noaa.gov/sltrends/sltrends_station.shtml?id=8443970.

[21] RESILIENTMASS PLAN: 2023 MASSACHUSETTS STATE HAZARD MITIGATION AND CLIMATE ADAPTATION PLAN (2023), https://www.mass.gov/doc/resilientmass-plan-2023/download.

economic base is located.[22] These values are conservative and assume no change in adaptation strategies along the coast. These direct impacts of flooding are largest and grow most rapidly in the Boston Harbor region, where a large portion of the Commonwealth's commercial economic base is located.[23]

15. Development along the Massachusetts coast is afforded protection from coastal buffers such as beaches and dunes, and from engineered coastal infrastructure such as revetments and seawalls. These coastal engineered structures will experience greater impacts from flooding and wave energy from the anticipated increase in frequency and intensity of coastal storm events associated with accelerated sea level rise and climate change. With these greater impacts will come more frequent need for maintenance and replacement of coastal engineered structures as well as beaches in the form of sediment nourishment at significant costs. For example, the Town of Winthrop needed additional protection from storm surge and flooding impacts for a suburban neighborhood with existing engineered shoreline structures (*i.e.*, seawalls, groins, and breakwaters) and an eroding beach. Between 2013 and 2014, at a cost of approximately $25 million in state funding, 460,000 cubic yards of sand, gravel, and cobble were placed along 4,200 linear feet of shoreline. The community gained approximately 150 feet of beach width at high tide and increased protection against wave energy and coastal storms. Other communities across Massachusetts have worked to design (e.g., Chatham, Provincetown, Nahant, New Bedford, and Rockport) and construct (e.g., Duxbury, Edgartown, Hull, Marshfield, Plymouth, and Scituate) a

[22] 2022 MASSACHUSETTS CLIMATE CHANGE ASSESSMENT VOLUME II – STATEWIDE REPORT 72 (2022), https://www.mass.gov/doc/2022-massachusetts-climate-change-assessment-december-2022-volume-ii-statewide-report.

[23] *Id.* at Appendix A: Full Statewide Impact Rankings and Scores by Sector. 2030 damages ($56 million) is equal to the sum of increase in damages from 2008 to "Current" ($22 million) and the increase in damages from "Current" to 2030 ($34 million).

variety of nourishment projects (e.g., cobble berms, beach and dune nourishment) to address erosion and failing coastal engineered structures that will be exacerbated by accelerated sea level rise and increased flooding from coastal storms. As described below, the Commonwealth provides substantial funding and technical assistance for these projects to protect coastal communities and their residents and businesses.

16. Coastal engineered structures, such as seawalls and revetments, have been constructed along over a quarter of the Commonwealth's ocean-facing shoreline to protect public and private infrastructure and assets from flooding and erosion. The Commonwealth and its municipalities own approximately 92 miles of such structures along the coastline. As a result of wave forces on the coastal structures and lowered beach elevations, the Commonwealth and local governments routinely invest millions of dollars to repair and reinforce these structures so they can adequately protect coastal communities. For example, in 2018 a seawall reconstruction project was completed in the Town of Marshfield to address coastal flooding and public safety issues. The Commonwealth provided a $1.85 million grant and loan award to the town, which was matched with roughly $620,000 in local funds. The approximately 600-foot section of seawall sustained damages during a coastal storm in January 2015, and the state-funded project increased the height of the seawall by two to three feet to better protect a public road, utilities, and homes. The Town of Marshfield has 32 coastal engineered structures along approximately 12 miles of exposed shoreline, totaling over 20,000 feet (3.9 miles), that have been identified as needing repairs and retrofits to address the current and future threats of sea level rise and coastal storms. With higher flood levels and greater storm surges, significantly more investments will be required to achieve the current flood-design protections afforded by these engineered structures across the coast.

17. The Commonwealth owns a substantial portion of the state's coastal property and infrastructure. The Commonwealth owns, operates, and maintains approximately 177 coastal state parks, beaches, reservations, and wildlife refuges located within the Massachusetts coastal zone. The Commonwealth also owns, operates, and maintains numerous properties, facilities, and infrastructure in the coastal zone, including roads, parkways, piers, and dams. Rising sea levels along the Massachusetts coast will result in either the permanent or temporary loss of the Commonwealth's coastal property through inundation, storm surge, flooding, and erosion events. These projected increases in sea levels will likely destroy or damage many of the state-owned facilities and infrastructure described above. The Commonwealth likely will be required to expend significant resources to protect, repair, rebuild, or possibly relocate the affected properties, facilities, and infrastructure. According to the Commonwealth's *2022 Massachusetts Climate Change Assessment*,[24] annual expected coastal flood damage to state- and state-authority owned properties is expected to increase relative to current risks of about $8 million statewide in the near term (2030s) to about $17 million and to over $52 million annually by the 2070s.[25]

18. The Massachusetts coastal zone is home to several major ports including the Port of Boston and New Bedford/Fairhaven Harbor. A 2018 economic study indicates the income generated from the Massachusetts maritime economy supports 2.6% of the state's direct employment and 1.3% of gross domestic product.[26] In 2018, New Bedford/Fairhaven Harbor

[24] 2022 MASSACHUSETTS CLIMATE CHANGE ASSESSMENT (2022), available at: https://www.mass.gov/info-details/massachusetts-climate-change-assessment.

[25] *Chapter 5. Risk Assessment and Hazard Analysis, in* RESILIENTMASS PLAN: 2023 MASSACHUSETTS STATE HAZARD MITIGATION AND CLIMATE ADAPTATION PLAN 5.1-39 (2023), https://www.mass.gov/info-details/2023-resilientmass-plan.

[26] *See* DAVID R. BORGES ET AL., UMASS DARTMOUTH PUBLIC POLICY CTR., NAVIGATING THE GLOBAL ECONOMY: A COMPREHENSIVE ANALYSIS OF THE MASSACHUSETTS MARITIME ECONOMY 11 (2018), www.mass.gov/files/documents/2018/01/24/Maritime_Economy.pdf.

alone generated $3.7 billion in direct business revenue from seafood processing and fleet operation businesses.[27] By nature of their purpose, the state's ports and harbors are generally low-lying, coastal-dependent areas of high density-built environment and are susceptible to service interruption and associated revenue loss when flooded or otherwise impacted by coastal events. Additionally, coastal dependent businesses, maritime schools, and public facilities and departments will face disruptions in service in post-storm conditions. Acknowledging the cultural and economic importance of the developed port areas in the Commonwealth, in 2021, CZM undertook a pilot study of two ports - Gloucester Inner Harbor and Chelsea Creek - to assess climate vulnerabilities and adaptation opportunities in these areas. The study found that the Gloucester Inner Harbor faces significant current and future flood risks with 50% of all water-dependent industrial use buildings exposed to the historic monthly high tide and 91% of all water-dependent industrial use buildings exposed to the current 1% annual chance flood. Relative to 2008 conditions, the number of buildings exposed to monthly high tides is expected to increase 50% by the 2030s. The study provides tailored resilience strategies (e.g., flood preparedness/business continuity planning, relocation and/or elevation of critical assets and infrastructure, floodproofing, etc.) that could be implemented to address flood risks while continuing to support the operational needs of water-dependent industrial users in port areas, which must remain in vulnerable locations directly adjacent to the water to maintain operations.[28]

19. The Commonwealth is committed to protecting public safety, human health, the environment, and public resources through programs and policies that address sea level rise and

[27] MARTIN ASSOCIATES & FOTH-CLE ENG'G GROUP, ECONOMIC IMPACT STUDY OF THE NEW BEDFORD/FAIRHAVEN HARBOR 5 (2019), https://www.fairhaven-ma.gov/system/files/uploads/economic_impact_study_nbfh_harbor_2019-martin-report_0.pdf.

[28] BUILDING RESILIENCE IN MASSACHUSETTS DESIGNATED PORT AREAS (2021), https://www.mass.gov/files/documents/2022/03/29/building-resilience-in-massachusetts-designated-port-areas.pdf.

other climate-change-related coastal hazards. EEA and CZM provide information, strategies, and tools to help other state agencies and communities plan for and address the challenges of erosion, flooding, storms, sea level rise, and other climate change impacts. In November of 2023, to address the impacts of climate change along the entire coastline of Massachusetts, EEA launched the CZM-led ResilientCoasts initiative.[29] Recognizing the significant threat climate change poses to the Commonwealth's coastal communities and the economy now and in the future, the initiative aims to develop a holistic statewide strategy for coastal resilience including identifying priority areas for regional collaboration and high priority locations where near-term flood risk intersects with high concentrations of people and housing, built infrastructure, and economic resources at risk.

20. EEA and CZM have established climate grant programs to support the resilience needs of local communities. Since 2014, CZM has awarded approximately $51.2 million (of $101.9 million requested) in state-funded grants to local communities and non-profit organizations to support sea level rise adaptation planning and implementation through the Coastal Resilience Grant Program.[30] Local governments and non-profit organizations have matched these state funds with roughly $17.6 million in local funds and in-kind services. Since 2017, EEA has awarded over $185 million of $350 million requested in municipal grants for climate vulnerability planning and implementation coastwide through the Municipal Vulnerability Preparedness (MVP) Program. Since the start of the MVP Program, local coastal

[29] MASSACHUSETTS OFFICE OF COASTAL ZONE MANAGEMENT, RESILIENTCOASTS INITIATIVE, https://www.mass.gov/info-details/resilientcoasts-initiative.

[30] MASSACHUSETTS OFFICE OF COASTAL ZONE MANAGEMENT, CZM GRANT VIEWER, https://www.mass.gov/info-details/czm-grant-viewer.

governments have matched MVP grants with over $60 million in local funds and staff time. EEA and CZM see a significant and growing need for funding support at the local level.

21. Municipalities, private entities, and other partners are also supporting planning and implementation of adaptation measures to address the impacts of sea level rise and other climate change impacts in Massachusetts. Adaptation planning efforts include vulnerability assessments to determine areas and infrastructure susceptible to coastal impacts, prioritization of vulnerable assets and areas, and development of adaptation alternatives to mitigate climate risks in the near and long term. One example is the City of Boston's "Climate Ready Boston" initiative, which has been developing neighborhood/district-level adaptation plans to address near-term (2030s-2050s) and long-term (2050s-2070s) actions for addressing future coastal flooding risks created by sea level rise. The City of Boston has developed strategies for all neighborhoods/districts along the City's 47-miles of coastline.[31] The City of Boston's reports estimate the costs for these actions range from $1.68 billion to $2.88 billion.[32] Another example of regional planning for the impacts of coastal climate change is the *Great Marsh Coastal Adaptation Plan* led by the National Wildlife Federation in partnership with the Ipswich River Watershed Association.[33] The plan assesses climate impacts and vulnerability for the Great Marsh region and each of its six communities (Salisbury, Newburyport, Newbury, Rowley,

[31] City of Boston, *New Strategies to Enhance Coastal Resilience in East Boston and Charlestown* (2022), https://www.boston.gov/news/new-strategies-enhance-coastal-resilience-east-boston-and-charlestown.

[32] *See Coastal Resilience Solutions for East Boston and Charlestown Phase One (2017)*, estimates range from $153M-$262M; *Coastal Resilience Solutions for South Boston (2018)*, estimates range from $513M-$1,000M; *Coastal Resilience Solutions for Downtown and The North End* (2020), estimates range from $189M-315M; *Coastal Resilience Solutions for Dorchester* (2020), estimates range from $111M-$215M; and *Coastal Resilience Solutions for East Boston and Charlestown Phase Two* (2022), estimates range from $710M-$1,090M; http://boston.gov/departments/climate-resilience/coastal-resilience-planning.

[33] *See* TAJ SCHOTTLAND ET AL., GREAT MARSH COASTAL ADAPTATION PLAN (2017), www.nwf.org/-/media/Documents/PDFs/NWF-Reports/NWF-Report_Great-Marsh-Coastal-Adaptation-Plan_2017.ashx.

Ipswich, and Essex), examining the risk and exposure of critical infrastructure and natural resources, and identifies areas of special concern. The plan states that in Newburyport, estimated one-time damages to buildings and structures (not contents) from a 1% annual exceedance probability storm (also known as the 100-year storm) under 1.09 feet of sea level rise would be $18.3 million, and under 3.45 feet of sea level rise the damages would increase to $32.4 million.[34]

22. As required by the Massachusetts Global Warming Solutions Act, Mass. Gen. Law ch. 21 N, and the Next-Generation Roadmap for Massachusetts Climate Policy, 2021 Mass. Acts ch. 8, the Massachusetts EOEEA Secretary released the Clean Energy and Climate Plan for 2025 and 2030 ("2025/2030 CECP," June 2022)[35] and the Clean Energy and Climate Plan for 2050 ("2050 CECP", December 2022).[36] The 2050 CECP requires that by 2050, the Commonwealth limit emission to achieve at least net zero greenhouse gas emissions statewide and economywide, and in no event higher than a level 85% below 1990 emissions baseline.[37] The 2025/2030 CECP sets interim limits requiring emissions at least 50% below 1990 by 2030, and at least 75% below by 2040.[38] In an effort to meet these climate goals, EEA has developed pathways to decarbonization, including increased use of offshore wind, solar, other clean energy sources, and energy storage solutions.[39] The 2050 CECP includes a benchmark of 23 gigawatts (GW) of installed offshore wind capacity, coupled with 27 GW of solar capacity, expected to be

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[34] *Id.* at 49, Table 3.3-3.

[35] *See* MASSACHUSETTS CLEAN ENERGY AND CLIMATE PLAN FOR 2025 AND 2030 (2022), https://www.mass.gov/doc/clean-energy-and-climate-plan-for-2025-and-2030/download.

[36] *Id.*

[37] *Id.*

[38] *Id.*

[39] *See* MASSACHUSETTS 2050 DECARBONIZATION ROADMAP (2020), https://www.mass.gov/doc/ma-2050-decarbonization-roadmap/download.

needed by 2050 to provide the 50 GW in clean electricity resources required to meet carbon emissions limits. The 2050 CECP also estimates that up to 9,500 additional full-time offshore wind workers will be needed by 2050, with an additional 16,400 additional workers required for related sectors of electricity distribution and transmission.

23. By indefinitely pausing permitting review and approval, and introducing regulatory uncertainty, the Memorandum hinders development of wind energy, which is crucial to meeting Massachusetts' climate mandate.

24. Without action, sea level rise and increases in the frequency, magnitude, and severity of coastal flooding, erosion, and storms related to greenhouse gas emissions will exacerbate harms to the Commonwealth and its residents, requiring expenditure of additional resources and incurring additional economic, social, and environmental costs.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Boston, Massachusetts on August 6, 2025.

/s/ Alison Brizius
Alison Brizius
Executive Office of Energy and Environmental Affairs
Office of Coastal Zone Management
Assistant Secretary and Director